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Attorneys at Law

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January 28, 2020

The Honorable Colleen McMahon
Chief United States District Judge
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *Foster v. Construction Realty Services Group, Inc., et al.*
Case No.: 18-cv-3020 (CM)

19-cv-3020

Dear Judge McMahon:

MEMO ENDORSED

My firm represents Plaintiff Ashley Foster in the above-referenced matter. Please be advised that a discovery dispute has arisen between the parties and pursuant to the Court's individual practices and the Court's May 9, 2019 scheduling order, I request that the Court refer the dispute to Magistrate Judge Cott.

In addition, with the consent of counsel for Defendants, I request one final 30-day extension of the discovery deadline, currently February 11, 2020. While the parties have responded to discovery requests and scheduled depositions, there may be additional matters, arising from the resolution of the dispute, that will take additional time to complete. In addition, the parties are in the process of scheduling a mediation at which this case, and other related matters, may be resolved.

There have been three prior requests for extensions due to ongoing settlement discussions, all of which were granted. This extension would also necessitate a 30 day extension of the deadline for submission of the Pre-Trial Order, currently March 30, 2020.

Thank you for your attention to this matter.

Sincerely yours,

/s

Jason L. Solotaroff

cc: Lisa Skruck, Esq.

1/29/2020